

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

TRAVELERS PROPERTY)
CASUALTY COMPANY OF)
AMERICA,)
Plaintiff,) CIVIL ACTION FILE NO.:
v.)
EMIL SUIUGAN and PRIME)
PAINTERS, LLC,)
Defendants.)

DECLARATION OF MARK MOCADLO

1. My name is Mark Mocadlo. I am over the age of eighteen years old, am suffering no disabilities, and am competent to execute this Declaration. I am a Director at Travelers Property Casualty Company of America ("Travelers"). The facts to which I am attesting herein are based on my personal knowledge and/or my review of the records of Travelers maintained in the ordinary course of business.
2. In my role at Travelers, I am sufficiently familiar with its practices regarding the creation and maintenance of its business records relating to insurance policies. I can affirmatively attest that these business records are created

contemporaneously with the activity reflected in the business record by a person with personal knowledge that the activity occurred as record and that person has a business duty to report the activity and maintained the business record in the regular and ordinary course of business for Travelers.

3. Travelers issued the following assigned risk worker's compensation insurance policies to the named insured Prime Painters, LLC:
 - A. Policy No. 6JUB-8H17878-6-17 for the period June 15, 2017 to June 15, 2018 ("2017 Policy");
 - B. Policy No. 6JUB-8H17878-6-18 for the period June 15, 2018 to June 15, 2019 ("2018 Policy");
 - C. Policy No. 6JUB-4N42607-7-19 for the period June 21, 2019 to June 15, 2020 ("2019 Policy");
 - D. Policy No. 6JUB-4N42607-7-20 for the period June 15, 2020 to June 15, 2021 ("2020 Policy"); and
 - E. Policy No. 6JUB-4N42607-7-21 for the period June 15, 2021 to June 15, 2022 ("2021 Policy").

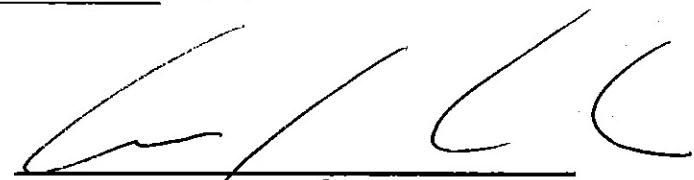
True and complete copies of these policies are attached hereto as Exhibits A through E, respectively.

4. The 2021 Policy was ultimately cancelled effective October 6, 2021.

5. As a result of information revealed during Travelers' audit of the 2021-2022 policy term, Prime Painters, LLC must pay Travelers the outstanding premium balances totaling at least \$923,378.00, including but not limited to:
 - \$155,641.00 for the 2018 Policy that was due no later than November 25, 2021;
 - \$150,306.00 for the 2019 Policy that was due no later than November 25, 2021;
 - \$159,790.00 for the 2020 Policy that was due no later than September 6, 2021; and
 - \$457,641.00 for the 2021 Policy
6. Travelers has requested specific information and documentation from Prime Painters, LLC, but has not received complete responses to date. A true and correct copy of an email chain between me and Emil Suiugan in August 2021 in which I requested information and documents from Mr. Suiugan is attached hereto as Exhibit F.
7. Despite demands for payment, Prime Painters, LLC has failed to pay Travelers the premium balances totaling at least \$923,378.00.

Pursuant to 28 U.S.C. § 1746, I declare by my signature below that the foregoing is true and correct, under penalty of perjury.

Signed this 13 day of March 2023.



Mark Mocadlo, Director, Travelers
Property Casualty Company of
America